

Willard J. Moody, Jr. #22866
Jonathan Hogins, #83982
The Moody Law Firm
500 Crawford Street, Suite 200
Portsmouth, VA 23704
Phone: (757) 393-6020
Fax: (757) 399-3019
Email: Will@modyrrlaw.com
Attorneys on behalf of Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

**IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION**

No. 2:15-MD-02641-DGC

**AMENDED MASTER SHORT FORM
COMPLAINT FOR DAMAGES FOR
INDIVIDUAL CLAIMS**

Plaintiff(s) named below, and for their Complaint against Defendants named below, incorporate The Master Complaint in MDL No. 2641 by reference (Doc. 364) Plaintiff(s) further show the court as follows:

1. Plaintiff/Deceased Party:

Judy Richard

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of consortium claim:

N/A

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator)

N/A

4. Plaintiff's state of residence at the time of implant:

Arkansas

5. Plaintiff's state of residence at the time of injury:

Arkansas

6. Plaintiff's current state of residence:

Arkansas

7. District Court and Division in which venue would be proper absent direct filing:

In the United States District Court of the Eastern District of Arkansas

8. Defendants (Check Defendants against whom Complaint is made):

- C.R. Bard Inc.
- Bard Peripheral Vascular, Inc.

9. Basis of Jurisdiction

- Diversity of Citizenship

a. Other allegations of jurisdiction and venue not expressed in Master Complaint:

A substantial portion of the events leading to Plaintiff's injuries arose in Arkansas making venue proper.

10. Defendants' Inferior Vena Cava Filter (s) about which Plaintiff(s) is making a claim

(Check applicable Inferior Vena Cava Filter(s)):

- Recovery ®Vena Cava Filter
- G2 ®Vena Cava Filter
- G2® Express Vena Cava Filter
- G2® X Vena Cava Filter
- Eclipse® Vena Cava Filter
- Meridian® Vena Cava Filter
- Denali® Vena Cava Filter
- S. Other:

11. Date of Implantation as to each Product

January 15, 2014

12. Counts in the Master Complaint brought by Plaintiff(s)

- Count I: Strict Products Liability-Manufacturing Defect
- Count II: Strict Products Liability-Information Defect (Failure to Warn)
- Count III: Strict Products Liability-Design Defect
- Count IV:Negligence- Design
- Count V: Negligence-Manufacture
- Count VI: Negligence-Failure to Revall/Retrofit
- Count VII: Negligent Misrepresentation
- Count VIII: Negligent *Per Se*
- Count X: Breach of Express Warranty
- Count XI: Breach of Implied Warranty
- Count XII: Fraudulent Misrepresentation
- Count XIII: Fraudulent Concealment
- Count XIV: Violations of Applicable Wisconsin (insert state) Law Prohibiting Consumer Fraud and Unfair and Deceptive Trade Practices
- Count XV: Loss of Consortium
- Count XVI: Wrongful Death
- Count XVII: Survival
- Punitive Damages

13. Jury Trial demanded for all issue so triable:

- Yes
- No

Date: February 21, 2017

By: /s/ Willard J. Moody, Jr.
Willard J. Moody, Jr. Esq.
Jonathan Hogins, Esq.
THE MOODY LAW FIRM, INC.
500 Crawford St. Ste. 200
P.O. Box 1138
Portsmouth, VA 23705
(757) 393-6020
(757) 399-3019 facsimile
will@modyrrlaw.com

I hereby certify that on this 21st day of February, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Willard J. Moody, Jr.